

CITIES AND TOWNS BULLETIN

AND UNIFORM COMPLIANCE GUIDELINES

ISSUED BY STATE BOARD OF ACCOUNTS

December 1997

YEAR END DUTIES

The following is a listing of duties and reports that occur each year end. Some of the articles have been published in this issue.

	<u>Bulletin Date</u>	<u>Page</u>
Fire Protection Contracts	This Issue	3
Encumbering Appropriations	This Issue	2-3
Cancellation of Warrants - Old Outstanding Checks	This Issue	2
Publication of Annual Report in Pamphlet Form - 2nd Class Cities	December, 1996	3
Annual Report	December, 1992	2-3
Certification of Names and Addresses to County Treasurer	December, 1996	3
Report of Names, Addresses, Duties and Compensation of Public Employees	This Issue	8
Annual Operational Report - Motor Vehicle Highway Fund	This Issue	3
Dormant Fund Balances - Transfers Authorized	This Issue	3
Monthly Bank Reconcilements	December, 1996	10

STATE BOARD OF ACCOUNTS INTERNET ADDRESSES

Homepage:	http://www.state.in.us/sboa
Charlie Pride:	cpride@sboa.state.in.us
Larry Tippin:	ltippin@sboa.state.in.us

CANCELLATION OF WARRANTS -- OLD OUTSTANDING CHECKS

Pursuant to IC 5-11-10.5, all checks outstanding and unpaid for a period of two years as of December 31 of each year shall be declared cancelled.

Not later than March 1 of each year, the treasurer shall prepare or cause to be prepared a list in duplicate of all checks outstanding for two or more years as of December 31 last preceding. The original copy shall be filed with the board of finance of the city or town and the duplicate copy maintained by the disbursing officer of the city or town. [Since Public Law 10, Acts of 1997, eliminated the Board of Finance in a city or town, we recommend such copy be filed with the city or town council.] The treasurer shall enter the amounts so listed as a receipt to the fund or funds upon which they were originally drawn and remove the checks from the list of outstanding checks. If the fund from which the check was originally drawn is not in existence or cannot be ascertained, the amount of the outstanding check shall be receipted into the general fund of the political subdivision.

The statute provides for the issuance of another check to replace a cancelled check if a claim is properly filed by the vendor or the person to whom the check was issued within seven years after the date of issuance of the original check. This check must be drawn upon the fund to which the cancelled check was receipted. Any check outstanding for more than seven years shall be considered void, and no recovery shall be made.

SOCIAL SECURITY TAX BASE CHANGES JANUARY 1

The 1998 contribution rate will remain at a total of 15.3 percent. The tax rate for both employees and employers for 1998 will be 7.65 percent. (6.2% Social Security and 1.45% Medicare)

We further understand that the maximum amount of earnings that will be subject to Social Security contributions will be raised from \$65,400 to \$68,400 effective January 1, 1998.

Please contact the Internal Revenue Service at 1-800-829-1040 if you should have questions on this matter.

STATE MILEAGE RATE INCREASE

Effective July 1, 1997 the State Budget Agency increased the mileage reimbursement rate paid to State employees from \$.25 to \$.28 per mile.

ENCUMBERED APPROPRIATIONS - BALANCE AVAILABLE

With the opening of a new budget year and a new set of ledgers, it is to the advantage of a municipality to review the unpaid purchase orders and contracts which remain on the ledgers as "encumbered."

Those items under contract are to be added for each appropriation account and the total carried to the new 1998 corresponding account. The actual unpaid amount of the purchase orders or contracts should be totaled and shown as a separate amount on the appropriation ledger sheet for 1998, with proper explanation, and added to the 1998 appropriation for the same purpose. By properly carrying out this procedure, the 1998 budget will not be expected to stand any expense not anticipated in making the budget.

ENCUMBERED APPROPRIATIONS - BALANCE AVAILABLE (Continued)

We suggest the proper officials of the city or town should make a listing of these encumbered items and make it part of their minutes in their last business meeting of the year. The State Board of Tax Commissioners should be sent a copy of the listing.

Keep in mind the appropriations encumbered and carried forward can be used for no other purpose other than the purchase order or the contract for which they were appropriated.

DORMANT FUND BALANCES TRANSFERS AUTHORIZED

IC 36-1-8-5 gives city and town councils authority to order the transfer to the general fund of any unused and unencumbered balance in any fund raised by a general or special tax levy, the purposes of which have been fulfilled. This action may be taken by a city or town council at any public meeting.

IC 36-1-8-5 states in part:

(a) This section applies to all funds raised by a general or special tax levy on all the taxable property of a political subdivision.

(b) Whenever the purposes of a tax levy have been fulfilled and an unused and unencumbered balance remains in the fund, the fiscal body of the political subdivision shall order the balance of that fund to be transferred as follows, unless a statute provides that it be transferred otherwise:....
.....(2) Funds of a municipality, to the general fund of the municipality.....

ANNUAL OPERATIONAL REPORT OF LOCAL ROAD AND STREET OPERATIONS

Indiana Code 8-17-4.1 requires an operational report shall be prepared by all cities and towns having a population of 20,000 or more with road and street responsibilities. The report shall list all receipts and disbursements related to the municipality's road and street system made from any of the municipal funds.

A copy shall be filed with the State Board of Accounts, the governing body of the municipality and the Planning Division, State Department of Highways by February 15 of the year next following the operational report year. The report shall also be made available to the public and press.

The annual operational report shall be prepared and filed on City and Town Form No. 225, (Rev. 1986), Sections 1 through 8.

FIRE PROTECTION CONTRACTS WITH VOLUNTEER FIRE COMPANIES

IC 36-8-12-3 authorizes cities and towns to enter into agreements with one or more volunteer fire companies that maintain adequate firefighting service for the use and operation of firefighting apparatus and equipment owned by the volunteer fire company, including the service of operators of the apparatus and equipment.

IC 36-8-12-4 states the contract must provide an amount determined by negotiation between the municipality and volunteer fire company. The consideration must include the amounts the unit is required to pay under this chapter for insurance premiums and clothing, automobile, and other allowances.

FIRE PROTECTION CONTRACTS WITH VOLUNTEER FIRE COMPANIES (Continued)

If the contractual agreement is properly drawn, an added benefit gained is the elimination of the problem of the governmental unit reporting clothing and auto allowances to Internal Revenue Service and the Indiana Department of Revenue. Since the contractual payments are lump sum to the volunteer fire company, the volunteer fire company assumes the responsibility for making the payments of allowances to the volunteer firefighters and for reporting of such payments.

Year end is a good time to review existing contracts for fire protection. If renewals or changes in contracts are necessary, such renewals or changes should be made under the guidance of the city or town attorney. All agreements for fire protection should be in writing and the agreements must be preserved as any other public documents. There is no statutory authority to make contractual payments to volunteer fire companies unless an agreement has been entered into.

CITY CLERKS, CITY AND TOWN CLERK-TREASURERS,
APPOINTMENT OF OFFICE PERSONNEL

IC 36-4-11-4, (City Clerks), IC 36-4-10-7, (City Clerk-Treasurers) and IC 36-5-6-7 (Town Clerk-Treasurers) authorize the Clerk or Clerk-Treasurer to appoint the number of deputies and employees needed for the effective operation of the office with the approval of the city or town council. This would require an independent action by the council, either by resolution or ordinance.

After the city or town council has authorized the number of deputies or employees, the clerk or clerk-treasurer may then make such appointments and fix the effective date thereof. The statutes further provide the deputies and employees appointed serve at "the pleasure of the" clerk, or clerk-treasurer.

CLERK-TREASURER
APPOINTMENT OF UTILITY
BILLING AND COLLECTION PERSONNEL

IC 36-4-10-7 and IC 36-5-6-7 states that if a city or town owns a utility and the clerk-treasurer is directly responsible for the billing and collection of that utility's rates and charges, the clerk-treasurer shall appoint those employees who are also responsible for that billing and collection. These employees serve at the clerk-treasurer's pleasure.

If the utility's governing body has taken the utility bookkeeping functions (billing, collecting, etc) from the clerk-treasurer, we feel the clerk-treasurer becomes responsible only once the funds come into his/her hands. Prior to that, utility employees are held responsible.

CITY CONTROLLER - APPOINTMENT OF DEPUTY

IC 36-4-11-5 states: " The city legislative body may, by ordinance, authorize the city fiscal officer to appoint a deputy. The fiscal officer is responsible for the official acts of his deputy." This statute refers to city controllers in second class cities only.

RECEIPT REGISTER

General Form No. 370, Receipt Register, has been prescribed by this office for those cities and towns which do not issue duplicate receipts. Printing specifications have been mailed to all printing suppliers.

REVISED RECEIPT FORMS

City Form No. 203A, Clerk-Treasurer's Receipt, Town Form No. 217, Clerk-Treasurer's Receipt, City and Town Court Form No. 214 C-T, City/Town Court Receipt and General Form No 352, General Receipt, have been revised to reflect payments made by credit card and electronic funds transfer.

Instructions on such additions have been mailed to the printing suppliers.

OMB CIRCULAR A-133 REQUIREMENTS

The Single Audit Act and the Office of Management and Budget (OMB) Circular A-133 set out the responsibilities of entities receiving federal awards. The Single Audit Act was amended on July 5, 1996. Circular A-133 was revised on June 30, 1997 and replaces Circular A-128, as well as the previous Circular A-133.

Circular A-133 has placed significant new responsibilities on the recipient of federal awards. We suggest you study this summary carefully and disseminate the appropriate information to those individuals in your organization that will be impacted.

Governmental units who expend at least \$300,000 in federal awards are subject to the provisions of OMB Circular A-133 beginning with audits of financial statements for periods beginning after June 30, 1997. Circular A-133 may be obtained from the Federal Register, June 30, 1997 (Volume 62, Number 125, Pages 35277-35302), by writing or calling the Office of Administration, Publications Office, room 2200, new Executive Office Building, Washington, DC 20503 (202) 395-7332, or via the Internet from the OMB homepage which is currently located at <http://www.whitehouse.gov/WH/EOP/omb>, under the captions "OMB Documents" and then "Grants Management." You should also obtain a copy of the June 30, 1997 Provisional Compliance Supplement form EOP publications, Office of Administration, 2200 NEOB, Washington, DC 20503 (202) 395-7332, or from the OMB homepage.

The following is a summary of Circular A-133. References in brackets are to the section number in Circular A-133.

Effective Dates

Circular A-133 is effective for annual or biennial periods beginning after June 30, 1996. All annual and biennial audits of periods beginning prior of June 30, 1996 will be performed under the provisions of Circular A-128.

New Threshold

The new threshold for a single audit will be \$300,000 in federal expenditures, including grants, loans, loan guarantees, property (including donated surplus property), cooperative agreements, interest subsidies, insurance, food commodities, direct appropriations, and other assistance. [Sec 200,205]

Auditee Responsibilities

New responsibilities are placed on the recipient of federal awards. The unit is required to do the following [Sec.300]:

- (a) Identify, in its accounts, all Federal awards received and expended and the Federal programs under which they were received. Federal program and award identification shall include, as applicable, the CFDA title and number, award number and year, name of the Federal agency, and name of the pass-through entity.
- (b) Maintain internal control over Federal programs that provides reasonable assurance that the unit is managing Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its Federal programs.
- (c) Comply with laws, regulations, and the provisions of contracts or grant agreements related to each of its Federal programs.
- (d) Prepare appropriate financial statements, including the Schedule of Expenditures of Federal Awards.
- (e) Follow up and take corrective action on audit findings, including preparation of a Summary Schedule of Prior Action Findings and a Corrective Action Plan.

OMB CIRCULAR A-133 REQUIREMENTS (Continued)Data Collection Form

A new form called Data Collection Form will be submitted to the federal clearinghouse with the Reporting Package. The Data Collection form summarizes the results of the audit and will be used by the clearinghouse as a central database of information for all A-133 audits performed in the U.S. The auditee and the auditor are to complete and sign the appropriate sections of the Data Collection Form. [Sec 320(b)]

Summary Schedule of Prior Audit Findings and Corrective Action Plan

The governmental unit is responsible for follow-up and corrective action on all audit findings. This includes the unit preparing the following [Sec. 315]:

- (1) Summary Schedule of Prior Audit Findings, if any were reported in the prior audit report, and
- (2) Corrective Action Plan for current year audit findings, if any are reported.

Note: Both of these schedules and the audit report will be included in the reporting package. As such, the Summary Schedule of Prior Audit Findings must be completed by the unit and made available to the field examiner very early in the audit and the Corrective Action plan must be completed by the end of the audit or soon thereafter.

Pass-Through Entity Responsibilities

Circular A-133 places certain responsibilities on those entities that passes federal awards through to other governmental entities or not-for-profit corporations. The most significant of those responsibilities require you to [Sec. 400(d)]:

- (1) Identify Federal awards made by informing each subrecipient of CFDA title and number, award name and number, award year, if the award is R&D, and name of Federal agency.
- (2) Advise subrecipients of requirements imposed on them by federal laws, regulations, and the provisions of contracts or grant agreements, as well as any supplemental requirements imposed by the pass-through entity.
- (3) Monitor the activities of subrecipients as necessary to ensure that federal awards are used for authorized purposes in compliance with laws, regulations and provisions of contracts or grant agreements and that performance goals are achieved.
- (4) Issue a management decision on audit findings within six months after receipt of the subrecipient's audit report and ensure that the subrecipient takes appropriate and timely corrective action.

Subrecipient Monitoring

As stated above, if your governmental entity passes federal awards through to other governmental entities or not-for-profit corporations, you are responsible for monitoring the activities of the subrecipient to ensure that the program requirements are being met. The preamble to Circular A-133 recognizes that many pass-through entities will no longer be able to use the Single Audit reports as the primary tool to monitor subrecipients due to the \$300,000 threshold. They will need to review their overall subrecipient monitoring process, and decide what, if any, additional monitoring procedures such as on-site visits, reviews of documentation supporting requests for reimbursement may be necessary to ensure subrecipient compliance. OMB expects pass-through entities to consider various risk factors in developing subrecipient monitoring procedures, such as the relative size and complexity of the Federal awards administered by subrecipients, prior experience with each subrecipient, and the cost-effectiveness of various monitoring procedures.

We recommend that the governmental unit have a formal subrecipient monitoring plan, preferably in written form, for all federal programs which pass federal monies through to subrecipients. The

monitoring plan should identify the procedures the governmental unit has in place to monitor the activities of the subrecipient to ensure that the program requirements are being met. Such monitoring plans could

OMB CIRCULAR A-133 REQUIREMENTS (Continued)

Subrecipient Monitoring (Continued)

include for instance, formal procedures to request subrecipients to provide written documentation supporting requests for reimbursements and the procedure the governmental unit will use to review such documentation, the nature, timing, and extent of on-site visits, etc.

Requests By Federal Agency

A federal agency is allowed to request that a particular program be audited as a major program [215(c)]. Such a request must be made to the auditee at least 180 days prior to the end of the fiscal year to be audited. If a federal agency has made such a request, please inform the State Board of Accounts field examiner at the beginning of the audit.

A federal agency is also allowed to request that certain federal programs not be considered low-risk, which would virtually guarantee that program being audited as a major program [520(c)(2)]. Such a request must also be made to the recipient of federal awards, and to the auditor, if known, within 180 days prior to the end of the fiscal year to be audited. This type of request must be approved by the Office of Management and Budget (OMB). If the OMB has approved such a request, please inform the State Board of Accounts field examiner at the beginning of the audit.

PUBLIC RECORDS - RETENTION SCHEDULES

On November 19, 1997, the State's Oversight Committee on Public Records approved retention schedules for city and town financial records. The schedules list prescribe forms and the length of time each form is required to be kept. There is a separate retention schedule for all cities and all towns above 5,000 population and one for all towns below 5,000 population. Copies of the retention schedules will be placed in the Accounting and Uniform Compliance Guidelines Manual for Cities and Towns.

IC 5-15-6-2.5 requires each local County Commission on Public Records to adopt such retention schedules at the first meeting of the County Commission following receipt of the schedules from the State Oversight Committee.

Once the retention schedules are adopted, records may be destroyed in accordance with the schedules and without permission of the local County Commission. However, cities and towns must submit documentation of such destruction to the County Commission and the State Archives.

W-4 REPORTING REQUIREMENTS

The following is an excerpt from a recent publication of the Indiana Department of Workforce Development.

Effective October 1, 1997, within twenty business days of a new employee's date of hire, all employers are to submit to the Indiana Department of Workforce Development (department) a report containing the following information:

- a. the new employee's name, address, and social security number; and
- b. the employer's name, address, and federal tax identification number.

W-4 REPORTING REQUIREMENTS (Continued)

The employer may submit the report by conveying to the department a copy of the new employee's W-4 form or, at the employer's option, an alternative scannable W-4 form. The department encourages employers to use the alternative form. In addition to expediting the department's processing of the reports, the form also has the additional advantages of being pre-printed with the employer's name and address and may be used as a substitute for the standard W-4 form. PRIOR TO USING THIS FORM, PLEASE REPRODUCE IT TO PROVIDE COPIES FOR YOUR FUTURE USE.

The report may be transmitted by:

- electronic facsimile transmittal (fax) to 1-800-408-1388; or
- electronically (internet) at <http://www.DWD.STATE.IN.US>; or
- magnetically (for detailed information concerning magnetic reporting, please call 1-800-437-9136); or
- by first class mail to:

New Hire Directory
Indiana Department of Workforce Development
10 North Senate Avenue, Room SE 007
Indianapolis, IN 46204

If the employer chooses to transmit the report electronic facsimile transmittal, electronically or magnetically, the report is considered timely if it is received by the department on or before the due date. If the employer choose to mail the report to the department, whether mailing a paper form or some form of magnetic media, the report is considered timely if postmarked by the due date.

An employer that has employees in two or more states and that transmits reports electronically and magnetically may designate one state in which to report all new hires. The employer must notify the Secretary of U.S. Department of Health and Human Services which state will receive the reports.

USE OF MOTOR VEHICLE HIGHWAY FUNDS
FOR LAW ENFORCEMENT PURPOSES

IC 8-14-1-5 allows cities and towns to use a portion of motor vehicles highway funds for law enforcement purposes, subject to the following limitations:

- (1) For cities and towns with a population of 5,000 or more, no more than 10% of the amounts distributed may be spent for law enforcement purposes.
- (2) For cities and towns with a population of less than 5,000, no more than 15% of the amounts distributed may be spent for law enforcement purposes.

REPORT OF NAMES, ADDRESSES, DUTIES
AND COMPENSATION OF PUBLIC EMPLOYEES

All cities and towns must file with the State Examiner, State Board of Accounts, 302 W. Washington St, Room E418, Indianapolis, Indiana, 46204, on or before January 31, Form 100-R, Certified Report of Names, Addresses, Duties and Compensation of Public Employees. This report is required by IC 5-11-13. A supply of this form must be secured from your public printer. That State Board of Accounts does not supply this form. (This is not to be confused with Form SF 23110 or Form SR9433 was mailed to each city controller and city and town clerk-treasurer on December 1 and due back in January.) If a computer print-out can supply all of the required information, it can be substituted in place of Form 100-R.

**APPROPRIATION REQUIREMENTS
CITY AND TOWN FUNDS**

<u>Fund</u>	<u>Requires Approval</u>		<u>I/C Reference</u>
	<u>Tax Board</u>	<u>City/Town Council</u>	
Accident Report	No	No	9-29-11
Alcohol and Drug Services	If Tax \$	Yes	12-23-14
Aviation	If Tax \$	Yes	8-22-5
Barrett Law	No	No	26-9-36
Bond and Interest Redemption	Yes	Yes	5-1-15
Cemetery	If Tax \$	Yes	23-14-24
City/Town User Fee	No	No	33-19-8
Clerk's Record Perpetuation	No	Yes	33-19-6
Cumulative Capital Improvement - Cigarette Tax	No	Yes	6-7-1-31.1
Cumulative Bridge Fund	Yes	Yes	8-16-3
Cumulative Building Fund - Airports	Yes	Yes	8-22-3
Cumulative Building Fund - Levees	Yes	Yes	13-2-31
Cumulative Maintenance Fund - Channel Improvements	Yes	Yes	13-3-3
Cumulative Firefighting Building, Equipment, Police Radio Fund	Yes	Yes	36-8-14
Cumulative Transportation Fund - Buses	Yes	Yes	36-9-4
Cumulative Building Funds	Yes	Yes	36-9-16
Cumulative Capital Improvement Fund	Yes	Yes	36-9-16
Cumulative Street Fund	Yes	Yes	36-9-16.5
General Improvement Fund	If Tax \$	Yes	36-9-17
Cumulative Building Fund - Sewers	Yes	Yes	36-9-26
Cumulative Drainage Fund	Yes	Yes	36-9-27
Cumulative Building Fund - Parks	Yes	Yes	36-10-3
Cumulative Sinking and Building Fund - Parks	Yes	Yes	36-10-4
Cumulative Capital Development	Yes	Yes	36-9-15.5
Deferral Program	No	Yes	34-4-32
Economic Development	If Tax \$(1)	Yes	36-7-14
Economic Development Income Tax (EDIT)	No	Yes	6-3.5-7
Electronic Map Generation	No	Yes	5-14-3
EMS	If Tax \$	Yes	16-1-39
Enhanced Access	No	Yes	5-14-3
Federal Grants	If Reimbursement Type Grants Yes/Yes		
Firearms Training	No	No	35-47-2
General	Yes	Yes	6-1.1-18
Health	If Tax \$	Yes	16-1-7
Landfill	If Tax \$	Yes	36-9-30
Local Law Enforcement Continuing Education	No	Yes	5-2-8
Local Road and Street	Yes	Yes	8-14-2
Motor Vehicle Highway	Yes	Yes	8-14-1
Park Nonreverting Capital	No	Yes	36-10-3
Park Nonreverting Operating	No	Yes or Park Bd.	36-10-3
Park and Recreation	If Tax \$	Yes	8-22-5
Parking Meter	If Tax \$	Yes	36-9-11
Probation	If Tax \$	Yes	35-38-2
Riverboat	No	Yes	36-1-8-9
Self Insurance	If Tax \$(2)	Yes(3)	36-1-8
Vehicle Inspection	No	Yes	9-29-4

(1) If funded 100% by TIF distributions - No

(2) If funded 100% by General Fund transfers - No

(3) See local ordinance for appropriation requirements.

The Indiana Department of Environmental Management (IDEM) is in the process of promulgating rules on underground storage tanks - financial responsibility of owners. **Please** contact IDEM with your comments and questions on this matter.

IDEM REQUESTS INPUT ON UNDERGROUND STORAGE TANK FINANCIAL ASSURANCE RULES

Per IC 13-23-1 -2, the Indiana Department of Environmental Management (IDEM) is **amending** the underground storage tank rules at 329 IAC 9 to comply with the federal regulations at **40 CFR 280**. These draft amendments tentatively will be published in the January 1, 1998 issue of the Indiana Register for public review and comment. Local governments are encouraged to submit comments during this formal comment period.

The underground storage tank rules apply to all owners and operators of underground storage tank (UST) systems with underground storage tanks as defined under IC 13-1 1-2-241. Certain UST systems as defined under 40 CFR 280.10 and 40 CFR 280.90 are excluded from all or part of the underground storage tank regulations.

A portion of the new draft rules at 329 IAC 9-8 pertain to financial responsibility. Owners or operators of petroleum UST systems as defined under 40 CFR 280.12 must demonstrate financial responsibility to take corrective action and to compensate third parties for bodily injury and property damage caused by accidental releases arising from the operation of petroleum underground storage tanks in a per occurrence amount of at least \$1,000,000. Owners or operators must demonstrate financial responsibility in at least the following annual aggregate amounts:

- (1) For owners or operators of 1- 100 tanks, \$1,000,000.
- (2) For owners or operators of 101 or more tanks, \$2,000,000.

Owners or operators must choose from one or a combination of the following mechanisms to demonstrate financial responsibility in the amount as stated above:

- (1) Financial test of self-assurance.
- (2) Guarantee with standby trust fund.
- (3) Insurance or risk retention group coverage.
- (4) *Surety* bond with standby trust fund.
- (5) Letter of credit with standby trust fund
- (6) Trust fund.
- (7) Local government bond rating test.
- (8) Local government financial test.
- (9)(a) Local government guarantee with standby trust made by a local government.
- (9)(b) Local government guarantee without standby trust made by a local government.
- (10) Local government fund.
- (11) Excess liability trust fund.

Mechanisms (1) through (10) closely reflect the federal language under 40 CFR 280 Subpart H. The excess liability trust fund is found under existing rules at 328 IAC 1.

IDEM believes that owners or operators of petroleum underground storage tanks that are eligible under 328 IAC I use the excess liability trust fund as the mechanism to demonstrate financial responsibility. However, this fund does not fully fund the financial responsibility obligation because there is a deductible required by IC 13-23-8-3. IDEM proposes in the new draft amendments that owners or operators of 12 or fewer tanks demonstrate the ability to pay the applicable deductible and that owners or operator of more than 12 tanks demonstrate the ability to

pay 2 times the applicable deductible.

As a part of the new financial responsibility rule, **IDEM** has developed new draft amendments under 329 IAC 9-8-1.1 to address the deductible. **IDEM** has attempted to provide mechanisms that are consistent with the federal mechanisms under 40 CFR 280 Subpart H, that are valid, and that are appropriate. Also, **IDEM** must get U.S. Environmental Protection Agency approval for these mechanisms.

The following is a list of the new draft mechanisms that owners or operators must choose from to demonstrate **financial** responsibility for the deductible.

- (1) Financial test of self-assurance.
- (2) Guarantee with standby trust fund.
- (3) Insurance or risk retention group coverage.
- (4) Surety bond with standby trust fund.
- (5) Letter of credit with standby trust fund.
- (6) Trust fund.
- (7) Certificate of deposit.
- (8) Local government bond rating test.
- (9) Local government financial test.
- (10)(a) Local government guarantee with standby trust made by a local government.
- (10)(b) Local government guarantee without standby trust made by a **local** government.
- (11) **Local** government fund.

IDEM particularly requests comments from local governments on options (8) through (11). These are located under 329 IAC 9-8-1.1 in the new draft amendments. Local governments are also encouraged to comment on other parts of the financial responsibility rules. Comments must be postmarked by February 2, 1998 and be mailed to Ms. Elaine Roemer at the following address. Local governments that are interested in receiving a copy and commenting on the new draft amendments under 329 IAC 9-8 should contact Ms. Roemer by calling 317-232-8883 or 1-800-451-6027 (in Indiana) or by writing to her at the following address:

Regulatory Development Section
Office of Solid and Hazardous Waste Management
Indiana Department of Environmental Management
P.O. Box 6015
Indianapolis, IN 46206-6015

Local governments may also wait until the January 1, 1998 issue of the Indiana Register is available and submit comments during the formal comment period on the financial assurance rules and other underground storage tank rules. Comments that are submitted as part of the formal comment period must be submitted to the person indicated in the Indiana Register and by the deadline indicated in the Indiana Register.

becomes apprehensive of a payment already made, we are asked if he or she is compelled to pay every claim approved by the council or proper board.

We would like to stress that a disbursing officer is not obligated to pay any claim which, is his/her judgement, should not be paid. Prejudice or personal feelings are not sufficient reasons for withholding payment. The correctness and legality of a claim should be your guide in disbursing public funds. The official surety bond requires that you make a faithful accounting. The bonded official should proceed with caution in every instance and, if needed, should seek the advice of the city or town attorney. See IC 36-4-8-4 - Cities; IC 36-5-4-2,3,4,6 - Towns; and IC 5-11-10 - All Disbursing Officers.

INDEX TO BULLETINS

Enclosed with this issue is an index to the following issues of the Cities and Towns Bulletin:

1988 - March, June, September, December,
1989 - March, June, September, December,
1990 - March, June, September, December,
1991 - March, June, September, December,
1992 - March, June, September, December,
1993 - March, June, September, December,
1994 - March, June, September, December,
1995 - March, June, September, December,
1996 - March, June, September, December,
1997 - March, June, September, December

The articles appearing in the year 1987 and prior issues have been revised and reprinted in later issues. Also, articles revised in later issues that have become obsolete have been omitted from the index. Please discard all issues prior to March 1988.

MERRY CHRISTMAS

In reflecting back over the past years, we have all been faced with many new problems and difficult decisions. Some of those problems have been resolved while many still remain for us to find solutions. We extend, as we have in the past, our sincerest efforts for cooperation in a joint effort to resolve those problems in our area of expertise.

We extend our thanks for the tremendous cooperation and assistance afforded our audit staff and this Board throughout this year in an effort to improve audit efficiency. From each of us and our staff to each of you and your staff, we send our best wishes for the holidays and our sincere wishes for a prosperous and happier new year.

Charles Johnson, III
State Examiner

Michael A. Fiwek
Deputy State Examiner

Robert Pearson
Deputy State Examiner

CITIES AND TOWNS BULLETIN

and Uniform Compliance Guidelines

December 1997 - Page 13

RATES for LEGAL ADVERTISING

Effective January 1, 1998

The following rates, effective January 1, 1998, were computed based upon the statutorily authorized 5% maximum increase allowed by P.L. 64-1995. Any percentage increase other than the 5% will require a separate computation by the State Board of Accounts. Any publisher that has not chosen to increase rates at all will continue to use the rate schedule that was effective January 1, 1988.

7 Em Column				
Type Size	Number of Insertions			
	1	2	3	4
5.5	0.234	0.351	0.467	0.584
6	0.214	0.321	0.428	0.535
6.5	0.198	0.297	0.395	0.494
7	0.184	0.276	0.367	0.459
7.5	0.172	0.257	0.343	0.428
8	0.161	0.241	0.321	0.402
9	0.143	0.214	0.286	0.357
10	0.129	0.193	0.257	0.321
12	0.107	0.161	0.214	0.268
Rate / Square	3.83	5.74	7.65	9.56

7.4 Em Column				
Type Size	Number of Insertions			
	1	2	3	4
5.5	0.247	0.371	0.494	0.617
6	0.227	0.340	0.453	0.566
6.5	0.209	0.314	0.418	0.522
7	0.194	0.291	0.388	0.485
7.5	0.181	0.272	0.362	0.453
8	0.170	0.255	0.340	0.424
9	0.151	0.227	0.302	0.377
10	0.136	0.204	0.272	0.340
12	0.113	0.170	0.226	0.283
Rate / Square	3.83	5.74	7.65	9.56

7.83 Em Column				
Type Size	Number of Insertions			
	1	2	3	4
5.5	0.262	0.392	0.523	0.653
6	0.240	0.360	0.479	0.599
6.5	0.221	0.332	0.442	0.553
7	0.206	0.308	0.411	0.513
7.5	0.192	0.288	0.383	0.479
8	0.180	0.270	0.359	0.449
9	0.160	0.240	0.319	0.399
10	0.144	0.216	0.288	0.359
12	0.120	0.180	0.240	0.299
Rate / Square	3.83	5.74	7.65	9.56

8 Em Column				
Type Size	Number of Insertions			
	1	2	3	4
5.5	0.267	0.401	0.534	0.667
6	0.245	0.367	0.490	0.612
6.5	0.226	0.339	0.452	0.565
7	0.210	0.315	0.420	0.524
7.5	0.196	0.294	0.392	0.489
8	0.184	0.276	0.367	0.459
9	0.163	0.245	0.326	0.408
10	0.147	0.220	0.294	0.367
12	0.123	0.184	0.245	0.306
Rate / Square	3.83	5.74	7.65	9.56

CITIES AND TOWNS BULLETIN

and Uniform Compliance Guidelines

December 1997 - Page 14

8.2 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.274	0.411	0.547	0.684
6	0.251	0.377	0.502	0.627
6.5	0.232	0.348	0.463	0.579
7	0.215	0.323	0.430	0.538
7.5	0.201	0.301	0.401	0.502
8	0.188	0.282	0.376	0.470
9	0.167	0.251	0.335	0.418
10	0.151	0.226	0.301	0.376
12	0.126	0.188	0.251	0.314
Rate / Square	3.83	5.74	7.65	9.56

8.3 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.277	0.416	0.554	0.692
6	0.254	0.381	0.508	0.635
6.5	0.235	0.352	0.469	0.586
7	0.218	0.327	0.435	0.544
7.5	0.203	0.305	0.406	0.508
8	0.191	0.286	0.381	0.476
9	0.170	0.254	0.339	0.423
10	0.153	0.229	0.305	0.381
12	0.127	0.191	0.254	0.317
Rate / Square	3.83	5.74	7.65	9.56

8.4 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.281	0.421	0.561	0.701
6	0.257	0.386	0.514	0.642
6.5	0.238	0.356	0.475	0.593
7	0.221	0.331	0.441	0.551
7.5	0.206	0.309	0.411	0.514
8	0.193	0.289	0.386	0.482
9	0.172	0.257	0.343	0.428
10	0.154	0.231	0.308	0.385
12	0.129	0.193	0.257	0.321
Rate / Square	3.83	5.74	7.65	9.56

8.5 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.284	0.426	0.567	0.709
6	0.260	0.390	0.520	0.650
6.5	0.240	0.360	0.480	0.600
7	0.223	0.335	0.446	0.557
7.5	0.208	0.312	0.416	0.520
8	0.195	0.293	0.390	0.488
9	0.174	0.260	0.347	0.433
10	0.156	0.234	0.312	0.390
12	0.130	0.195	0.260	0.325
Rate / Square	3.83	5.74	7.65	9.56

8.6 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.287	0.431	0.574	0.718
6	0.264	0.395	0.526	0.658
6.5	0.243	0.365	0.486	0.607
7	0.226	0.338	0.451	0.564
7.5	0.211	0.316	0.421	0.526
8	0.198	0.296	0.395	0.493
9	0.176	0.263	0.351	0.438
10	0.158	0.237	0.316	0.395
12	0.132	0.197	0.263	0.329
Rate / Square	3.83	5.74	7.65	9.56

8.75 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.292	0.438	0.584	0.730
6	0.268	0.402	0.536	0.669
6.5	0.247	0.371	0.494	0.618
7	0.230	0.344	0.459	0.574
7.5	0.214	0.321	0.428	0.535
8	0.201	0.301	0.402	0.502
9	0.179	0.268	0.357	0.446
10	0.161	0.241	0.321	0.402
12	0.134	0.201	0.268	0.335
Rate / Square	3.83	5.74	7.65	9.56

CITIES AND TOWNS BULLETIN

and Uniform Compliance Guidelines

December 1997 - Page 15

8.8 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.294	0.441	0.588	0.734
6	0.270	0.404	0.539	0.673
6.5	0.249	0.373	0.497	0.621
7	0.231	0.346	0.462	0.577
7.5	0.216	0.323	0.431	0.538
8	0.202	0.303	0.404	0.505
9	0.180	0.269	0.359	0.449
10	0.162	0.242	0.323	0.404
12	0.135	0.202	0.269	0.337
Rate / Square	3.83	5.74	7.65	9.56

8.9 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.297	0.446	0.594	0.743
6	0.273	0.409	0.545	0.681
6.5	0.252	0.377	0.503	0.628
7	0.234	0.350	0.467	0.583
7.5	0.218	0.327	0.436	0.545
8	0.205	0.307	0.409	0.511
9	0.182	0.272	0.363	0.454
10	0.164	0.245	0.327	0.408
12	0.136	0.204	0.272	0.340
Rate / Square	3.83	5.74	7.65	9.56

9 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.301	0.451	0.601	0.751
6	0.276	0.413	0.551	0.688
6.5	0.255	0.381	0.508	0.635
7	0.236	0.354	0.472	0.590
7.5	0.221	0.331	0.441	0.551
8	0.207	0.310	0.413	0.516
9	0.184	0.276	0.367	0.459
10	0.165	0.248	0.330	0.413
12	0.138	0.207	0.275	0.344
Rate / Square	3.83	5.74	7.65	9.56

9.3 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.311	0.466	0.621	0.776
6	0.285	0.427	0.569	0.711
6.5	0.263	0.394	0.525	0.657
7	0.244	0.366	0.488	0.610
7.5	0.228	0.342	0.455	0.569
8	0.214	0.320	0.427	0.533
9	0.190	0.285	0.379	0.474
10	0.171	0.256	0.341	0.427
12	0.142	0.214	0.285	0.356
Rate / Square	3.83	5.74	7.65	9.56

9.5 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.318	0.476	0.634	0.793
6	0.291	0.436	0.581	0.727
6.5	0.269	0.403	0.537	0.671
7	0.249	0.374	0.498	0.623
7.5	0.233	0.349	0.465	0.581
8	0.218	0.327	0.436	0.545
9	0.194	0.291	0.388	0.484
10	0.175	0.262	0.349	0.436
12	0.146	0.218	0.291	0.363
Rate / Square	3.83	5.74	7.65	9.56

9.6 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.321	0.481	0.641	0.801
6	0.294	0.441	0.588	0.734
6.5	0.272	0.407	0.542	0.678
7	0.252	0.378	0.504	0.629
7.5	0.235	0.353	0.470	0.587
8	0.221	0.331	0.441	0.551
9	0.196	0.294	0.392	0.489
10	0.176	0.264	0.353	0.441
12	0.147	0.220	0.294	0.367
Rate / Square	3.83	5.74	7.65	9.56

CITIES AND TOWNS BULLETIN

and Uniform Compliance Guidelines

December 1997 - Page 16

9.9 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.331	0.496	0.661	0.826
6	0.303	0.455	0.606	0.757
6.5	0.280	0.420	0.559	0.699
7	0.260	0.390	0.519	0.649
7.5	0.243	0.364	0.485	0.606
8	0.228	0.341	0.454	0.568
9	0.202	0.303	0.404	0.505
10	0.182	0.273	0.364	0.454
12	0.152	0.227	0.303	0.379
Rate / Square	3.83	5.74	7.65	9.56

10 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.334	0.501	0.668	0.834
6	0.306	0.459	0.612	0.765
6.5	0.283	0.424	0.565	0.706
7	0.263	0.394	0.525	0.656
7.5	0.245	0.367	0.490	0.612
8	0.230	0.344	0.459	0.574
9	0.204	0.306	0.408	0.510
10	0.184	0.276	0.367	0.459
12	0.153	0.230	0.306	0.382
Rate / Square	3.83	5.74	7.65	9.56

10.5 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.351	0.526	0.701	0.876
6	0.322	0.482	0.643	0.803
6.5	0.297	0.445	0.593	0.741
7	0.276	0.413	0.551	0.688
7.5	0.257	0.386	0.514	0.642
8	0.241	0.362	0.482	0.602
9	0.214	0.321	0.428	0.535
10	0.193	0.289	0.386	0.482
12	0.161	0.241	0.321	0.402
Rate / Square	3.83	5.74	7.65	9.56

11 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.368	0.551	0.734	0.918
6	0.337	0.505	0.673	0.841
6.5	0.311	0.466	0.621	0.777
7	0.289	0.433	0.577	0.721
7.5	0.270	0.404	0.539	0.673
8	0.253	0.379	0.505	0.631
9	0.225	0.337	0.449	0.561
10	0.202	0.303	0.404	0.505
12	0.169	0.253	0.337	0.421
Rate / Square	3.83	5.74	7.65	9.56

11.25 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.376	0.564	0.751	0.939
6	0.345	0.517	0.689	0.860
6.5	0.318	0.477	0.636	0.794
7	0.295	0.443	0.590	0.737
7.5	0.276	0.413	0.551	0.688
8	0.259	0.387	0.516	0.645
9	0.230	0.344	0.459	0.574
10	0.207	0.310	0.413	0.516
12	0.172	0.258	0.344	0.430
Rate / Square	3.83	5.74	7.65	9.56

11.5 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.384	0.576	0.768	0.959
6	0.352	0.528	0.704	0.880
6.5	0.325	0.487	0.650	0.812
7	0.302	0.453	0.603	0.754
7.5	0.282	0.422	0.563	0.704
8	0.264	0.396	0.528	0.660
9	0.235	0.352	0.469	0.586
10	0.211	0.317	0.422	0.528
12	0.176	0.264	0.352	0.440
Rate / Square	3.83	5.74	7.65	9.56

CITIES AND TOWNS BULLETIN

and Uniform Compliance Guidelines

December 1997 - Page 17

12 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.401	0.601	0.801	1.001
6	0.368	0.551	0.734	0.918
6.5	0.339	0.509	0.678	0.847
7	0.315	0.472	0.629	0.787
7.5	0.294	0.441	0.588	0.734
8	0.276	0.413	0.551	0.688
9	0.245	0.367	0.490	0.612
10	0.221	0.331	0.441	0.551
12	0.184	0.276	0.367	0.459
Rate / Square	3.83	5.74	7.65	9.56

12.2 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.408	0.611	0.815	1.018
6	0.374	0.560	0.747	0.933
6.5	0.345	0.517	0.689	0.861
7	0.320	0.480	0.640	0.800
7.5	0.299	0.448	0.597	0.746
8	0.280	0.420	0.560	0.700
9	0.249	0.373	0.498	0.622
10	0.224	0.336	0.448	0.560
12	0.187	0.280	0.373	0.467
Rate / Square	3.83	5.74	7.65	9.56

12.4 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.414	0.621	0.828	1.035
6	0.380	0.569	0.759	0.948
6.5	0.351	0.526	0.701	0.875
7	0.326	0.488	0.650	0.813
7.5	0.304	0.456	0.607	0.759
8	0.285	0.427	0.569	0.711
9	0.253	0.380	0.506	0.632
10	0.228	0.342	0.455	0.569
12	0.190	0.285	0.379	0.474
Rate / Square	3.83	5.74	7.65	9.56

12.41 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.415	0.622	0.829	1.035
6	0.380	0.570	0.759	0.949
6.5	0.351	0.526	0.701	0.876
7	0.326	0.488	0.651	0.814
7.5	0.304	0.456	0.608	0.759
8	0.285	0.427	0.570	0.712
9	0.253	0.380	0.506	0.633
10	0.228	0.342	0.456	0.569
12	0.190	0.285	0.380	0.475
Rate / Square	3.83	5.74	7.65	9.56

12.5 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.418	0.626	0.835	1.043
6	0.383	0.574	0.765	0.956
6.5	0.354	0.530	0.706	0.882
7	0.328	0.492	0.656	0.819
7.5	0.306	0.459	0.612	0.765
8	0.287	0.431	0.574	0.717
9	0.255	0.383	0.510	0.637
10	0.230	0.344	0.459	0.574
12	0.192	0.287	0.383	0.478
Rate / Square	3.83	5.74	7.65	9.56

13 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.435	0.651	0.868	1.085
6	0.398	0.597	0.796	0.994
6.5	0.368	0.551	0.734	0.918
7	0.341	0.512	0.682	0.852
7.5	0.319	0.478	0.636	0.795
8	0.299	0.448	0.597	0.746
9	0.266	0.398	0.530	0.663
10	0.239	0.358	0.477	0.597
12	0.199	0.298	0.398	0.497
Rate / Square	3.83	5.74	7.65	9.56

CITIES AND TOWNS BULLETIN

and Uniform Compliance Guidelines

December 1997 - Page 18

13.5 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.451	0.676	0.901	1.126
6	0.414	0.620	0.826	1.032
6.5	0.382	0.572	0.763	0.953
7	0.355	0.531	0.708	0.885
7.5	0.331	0.496	0.661	0.826
8	0.310	0.465	0.620	0.774
9	0.276	0.413	0.551	0.688
10	0.248	0.372	0.496	0.619
12	0.207	0.310	0.413	0.516
Rate / Square	3.83	5.74	7.65	9.56

14 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.468	0.701	0.935	1.168
6	0.429	0.643	0.857	1.071
6.5	0.396	0.593	0.791	0.988
7	0.368	0.551	0.734	0.918
7.5	0.343	0.514	0.685	0.857
8	0.322	0.482	0.643	0.803
9	0.286	0.429	0.571	0.714
10	0.257	0.386	0.514	0.642
12	0.214	0.321	0.428	0.535
Rate / Square	3.83	5.74	7.65	9.56

14.5 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.485	0.726	0.968	1.210
6	0.444	0.666	0.887	1.109
6.5	0.410	0.615	0.819	1.024
7	0.381	0.571	0.761	0.951
7.5	0.355	0.533	0.710	0.887
8	0.333	0.499	0.666	0.832
9	0.296	0.444	0.592	0.739
10	0.267	0.400	0.532	0.665
12	0.222	0.333	0.444	0.554
Rate / Square	3.83	5.74	7.65	9.56

15 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.501	0.751	1.001	1.251
6	0.460	0.689	0.918	1.147
6.5	0.424	0.636	0.847	1.059
7	0.394	0.590	0.787	0.983
7.5	0.368	0.551	0.734	0.918
8	0.345	0.517	0.689	0.860
9	0.306	0.459	0.612	0.765
10	0.276	0.413	0.551	0.688
12	0.230	0.344	0.459	0.574
Rate / Square	3.83	5.74	7.65	9.56

16.5 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.552	0.827	1.102	1.377
6	0.506	0.758	1.010	1.262
6.5	0.467	0.699	0.932	1.165
7	0.433	0.649	0.866	1.082
7.5	0.404	0.606	0.808	1.010
8	0.379	0.568	0.757	0.946
9	0.337	0.505	0.673	0.841
10	0.303	0.455	0.606	0.757
12	0.253	0.379	0.505	0.631
Rate / Square	3.83	5.74	7.65	9.56

17 Em Column

Type Size	<u>Number of Insertions</u>			
	1	2	3	4
5.5	0.568	0.852	1.135	1.418
6	0.521	0.781	1.040	1.300
6.5	0.481	0.721	0.960	1.200
7	0.446	0.669	0.892	1.114
7.5	0.417	0.625	0.832	1.040
8	0.391	0.585	0.780	0.975
9	0.347	0.520	0.694	0.867
10	0.313	0.468	0.624	0.780
12	0.260	0.390	0.520	0.650
Rate / Square	3.83	5.74	7.65	9.56

CITIES AND TOWNS BULLETIN

and Uniform Compliance Guidelines

December 1997 - Page 19

18 Em Column					20 Em Column				
Type Size	<u>Number of Insertions</u>				Type Size	<u>Number of Insertions</u>			
	1	2	3	4		1	2	3	4
5.5	0.602	0.902	1.202	1.502	5.5	0.669	1.002	1.335	1.669
6	0.552	0.827	1.102	1.377	6	0.613	0.918	1.224	1.530
6.5	0.509	0.763	1.017	1.271	6.5	0.566	0.848	1.130	1.412
7	0.473	0.708	0.944	1.180	7	0.525	0.787	1.049	1.311
7.5	0.441	0.661	0.881	1.101	7.5	0.490	0.735	0.979	1.224
8	0.414	0.620	0.826	1.032	8	0.460	0.689	0.918	1.147
9	0.368	0.551	0.734	0.918	9	0.409	0.612	0.816	1.020
10	0.331	0.496	0.661	0.826	10	0.368	0.551	0.734	0.918
12	0.276	0.413	0.551	0.688	12	0.306	0.459	0.612	0.765
Rate / Square	3.83	5.74	7.65	9.56	Rate / Square	3.83	5.74	7.65	9.56